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May 8, 2023

By ECF and Email

The Honorable Lewis A. Kaplan United States District Judge United States Courthouse 500 Pearl Street New York, NY 10007 USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC B.
DATE FILED: 5-8.23

Re:

Daniel Kleeberg et al. v. Lester Eber et al., 1:16-cv-09517-LAK-KHP

Joint Request to Extend All Deadlines

Dear Judge Kaplan,

I write on behalf of all parties to respectfully request that the Court extend all of today's deadlines by two weeks, to May 22, 2023. Over the weekend, the parties made substantial progress towards a settlement that would avoid or narrow much of the post-trial briefing that is currently due today. Indeed, there is an agreement on most if not all material terms, but the precise language for a release and its scope has yet to be determined.

As of this writing, Defendants' opposition to Plaintiffs' Rule 60 Motion is due today and has not been previously extended. In addition, Plaintiffs' bill of costs and Motion for Attorney Fees is due today pursuant to a prior extension granted by the Court.

We thank the Court for its attention to this matter.

Respectfully submitted,

Brian C. Brook

cc: All counsel of record

LEWIS A. KAPLAN, USDJ

SO ORDERED

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